

Loren L. Forrest, Jr.  
Holland & Knight LLP  
31 West 52nd Street  
New York, New York 10019  
Tel: (212) 513-3200  
Fax: (212) 385-9010

*Attorneys for Garda CL Atlantic, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

COLLAZOS,

Plaintiff,

v.

GARDA CL ATLANTIC, INC.,

Defendants.

21-cv-02095-PKC-JRC

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that upon the annexed affidavit of Loren L. Forrest, Jr., sworn to on the 18th day of May, 2022, the exhibits annexed thereto, the accompanying memorandum of law, and upon all the pleadings and proceedings had herein, the undersigned will move this Court, pursuant to the provisions of the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, on behalf of the Defendant Garda CL Atlantic, Inc. (“Garda”), before The Honorable Pamela K. Chen, United States District Court, United States Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date to be scheduled by the Court, at 9:30 a.m. of that day or as soon thereafter as Garda can be heard, for an Order (a) compelling Plaintiff Carlos Collazos (“Collazos”) to arbitrate his claims against Garda and (b) staying this action pending the outcome of the arbitration. In the alternative, Garda requests that this Court dismiss Plaintiff’s class action claims, pending Plaintiff’s pursuit of his claims in pre-

arbitration proceedings, in accordance with his collective bargaining agreement.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the Court's order of May 3, 2022, opposition papers, if any, shall be served no later than June 1, 2022, and reply papers shall be served no later than July 10, 2022.

Dated: New York, New York  
May 18, 2022

HOLLAND & KNIGHT LLP

By: /s/ Loren L. Forrest, Jr.  
Loren L. Forrest, Jr.

Holland & Knight LLP  
31 West 52nd Street  
New York, New York 10019  
Tel: (212) 513-3200  
Fax: (212) 385-9010  
Attorneys for Garda CL Atlantic, Inc.